

1 Glenn D. Pomerantz (SBN 112503)  
glenn.pomerantz@mto.com

2 **MUNGER, TOLLES & OLSON LLP**  
350 South Grand Avenue, Fiftieth Floor  
3 Los Angeles, California 90071  
Telephone: (213) 683-9100

4 Brian C. Rocca (SBN 221576)  
brian.rocca@morganlewis.com  
5 **MORGAN, LEWIS & BOCKIUS LLP**  
6 One Market, Spear Street Tower  
San Francisco, CA 94105-1596  
7 Telephone: (415) 442-1000

8 Daniel M. Petrocelli, Bar No. 97802  
dpetrocelli@omm.com

9 **O'MELVENY & MYERS LLP**  
1999 Avenue of the Stars, 7th Fl.  
10 Los Angeles, CA 90067-6035  
Telephone: (310) 553-6700

11 *Counsel for Defendants Google LLC et al.*

12  
13 [Additional counsel appear on signature page]

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17  
18 **IN RE GOOGLE PLAY STORE**  
**ANTITRUST LITIGATION**

19 THIS DOCUMENT RELATES TO:

20 *In re Google Play Consumer Antitrust*  
21 *Litigation*, Case No. 3:20-cv-05761-JD

Karma M. Guilianelli (SBN 184175)  
karma.giulianelli@bartlitbeck.com

**BARTLIT BECK LLP**  
1801 Wewetta St., Suite 1200  
Denver, Colorado 80202  
Telephone: (303) 592-3100

Hae Sung Nam (*pro hac vice*)  
hnam@kaplanfox.com

**KAPLAN FOX & KILSHEIMER LLP**  
850 Third Avenue  
New York, NY 10022  
Tel.: (212) 687-1980

*Co-Lead Counsel for the Proposed Class in In re Google Play Consumer Antitrust Litigation*

**Case No. 3:21-md-02981-JD**

**STIPULATION AND [PROPOSED]  
ORDER RE: FILING AMENDED  
ANSWER TO CONSUMER  
PLAINTIFFS' SECOND AMENDED  
COMPLAINT**

1 WHEREAS, Consumer Plaintiffs filed their Second Amended Complaint (“SAC”) (3:21-  
2 md-02981-JD ECF No. 172; 3:20-cv-05761-JD ECF No. 241) on December 20, 2021;

3 WHEREAS, Defendants (“Google”) filed their Answer to Consumer Plaintiffs’ SAC  
4 (3:21-md-02981-JD ECF No. 180; 3:20-cv-05761-JD ECF No. 247) on January 14, 2022;

5 WHEREAS, the Court entered the Scheduling Order on October 22, 2021 (3:21-md-  
6 02981-JD ECF No. 122) which set a deadline for amending pleadings on December 3, 2021, and  
7 an Amended Scheduling Order (3:21-md-02981-JD ECF No. 191) on February 2, 2022 stating that  
8 the deadline to amend pleadings was “closed”;

9 WHEREAS, Google wishes to correct the numbering of the cross-references in certain  
10 paragraphs;

11 WHEREAS, Google believes that there is good cause to amend its Answer;

12 WHEREAS, Google and Consumer Plaintiffs are not aware of any prejudice on any party  
13 in the above-captioned actions that would result from permitting Google to amend its Answer;

14 WHEREAS, the Consumer Plaintiffs do not oppose this amendment;

15 WHEREAS, Google’s proposed corrections are reflected in the attached Exhibit 1, and can  
16 be seen in paragraphs 31, 38, 47, 65, 188, 190, 211, 213, 214, 222, 232, 240, 270, 281, 288, 289,  
17 303, 304, 312, 326, and 335.

18 NOW, THEREFORE, the Defendants and Consumer Plaintiffs hereby stipulate and agree,  
19 subject to the Court’s approval, as follows:

- 20 1. There is good cause to permit Google to amend its Answer to Consumer Plaintiffs’  
21 SAC, as reflected in Exhibit 1 attached hereto;
- 22 2. Google’s request to amend its Answer (3:21-md-02981-JD ECF No. 180; 3:20-cv-  
23 05761-JD ECF No. 247) to Consumer Plaintiffs’ SAC (3:21-md-02981-JD ECF  
24 No. 172; 3:20-cv-05761-JD ECF No. 241) in accordance with Exhibit 1 should be,  
25 and upon the Court’s signature is hereby, granted;
- 26 3. Upon the Court’s signature, Google will file its amended answer, in accordance  
27 with Exhibit 1, on the docket as a separate ECF entry.

28 IT IS SO STIPULATED.

1 DATED: March 22, 2022

MORGAN, LEWIS & BOCKIUS LLP

Brian C. Rocca  
Sujal J. Shah  
Michelle Park Chiu  
Minna L. Naranjo  
Rishi P. Satia

5 Respectfully submitted,

7 By: /s/ Brian C. Rocca  
Brian C. Rocca  
8 *Counsel for Defendants Google LLC et al.*

9  
10 DATED: March 22, 2022

O'MELVENY & MYERS LLP

Daniel M. Petrocelli  
Ian Simmons  
Benjamin G. Bradshaw  
Stephen J. McIntyre

13 Respectfully submitted,

15 By: /s/ Daniel M. Petrocelli  
Daniel M. Petrocelli  
16 *Counsel for Defendants Google LLC et al.*

17  
18 DATED: March 22, 2022

MUNGER, TOLLES & OLSON LLP

Glenn D. Pomerantz  
Kyle W. Mach  
Kuruvilla Olasa  
Justin P. Raphael  
Emily C. Curran-Huberty  
Jonathan I. Kravis

22 Respectfully submitted,

24 By: /s/ Glenn D. Pomerantz  
Glenn D. Pomerantz  
25 *Counsel for Defendants Google LLC et al.*

1 Dated: March 22, 2022

BARTLIT BECK LLP  
Karma M. Giulianelli

2  
3 KAPLAN FOX & KILSHEIMER LLP  
Hae Sung Nam

4 Respectfully submitted,

5 By: /s/ Karma M. Giulianelli  
Karma M. Giulianelli

6  
7 *Co-Lead Counsel for the Proposed Class in*  
8 *In re Google Play Consumer Antitrust*  
9 *Litigation*

**E-FILING ATTESTATION**

I, Kuruvilla Olasa, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Kuruvilla Olasa

Kuruvilla Olasa

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 DATED: \_\_\_\_\_

4  
5  
6 HON. JAMES DONATO  
U.S. District Judge